



These CDMA/GSM/UMTS operations are in places where ATN has few cell sites. Even where the table appears to show a larger number of sites, such as Pima County, Arizona, the number of sites must be put into context with the area being served. For example, Pima County, home to the city of Tucson, Arizona, has a total land area of 9,187 square miles, of which the Tucson populated area covers only about 1,500 square miles. (ATN is *not* licensed for and does not cover the city of Tucson or any suburbs thereof.) The rest of Pima County, on the other side of the Sierrita Mountains from Tucson and its suburbs, consists of the Sonoran Desert, the Buenos Aires and Cabeza Prieta National Wildlife Refuges, Organ Pipe Cactus National Monument, and the Tohono O'odham Indian Reservation. This wild, sparsely populated and remote area, larger by far than the state of Connecticut (which has a land area of only 4,485 square miles), presents a challenge to serve at all, as the local PSAP has recognized.

Respectfully submitted,

January 18, 2019

Rini Coran, PC  
1140 19<sup>th</sup> Street NW, Suite 600  
Washington, DC 20036

By:                     /s/                      
David J. Kaufman, Counsel  
202-955-5516  
[dkaufman@rinicoran.com](mailto:dkaufman@rinicoran.com)

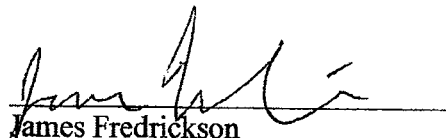
## DECLARATION OF JAMES FREDRICKSON

I, James Fredrickson, declare under penalty of perjury that:

I am the Vice President Network Engineering for ATN International, Inc. and its subsidiaries operating in the U.S. Virgin Islands, (collectively, "ATN"). I am the individual who serves as the chief contact person with oversight responsibility for monitoring the overall status of location accuracy compliance under Section 20.18(h) for ATN. I have read the foregoing January 18, 2019 E911 Exclusion Report for ATN, including the table attached thereto. All facts set forth therein are true and correct, to the best of my knowledge, information and belief.

My business address and phone number are: 500 Cummings Center #2450, Beverly, MA 01915, Tel. 978-619-1326.

Executed as of January 18, 2019.

  
James Fredrickson

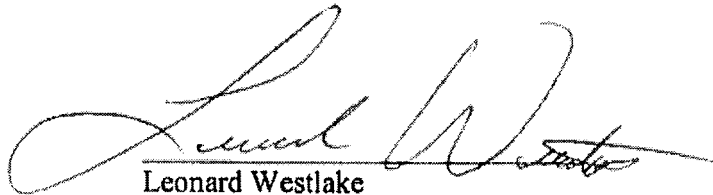
## DECLARATION OF LEONARD WESTLAKE

I, Leonard Westlake, declare under penalty of perjury that:

I am the Vice President Network Engineering for Commnet Wireless, LLC and its subsidiaries, (collectively, "Commnet"). I am the individual who serves as the chief contact person with oversight responsibility for monitoring the overall status of location accuracy compliance under Section 20.18(h) for Commnet. I have read the foregoing January 18, 2019 E911 Exclusion Report for Commnet, including the table attached thereto. All facts set forth therein are true and correct, to the best of my knowledge, information and belief.

My business address and phone number are: 1562 Park St # E, Castle Rock, CO 80109, Tel. 720-733-7696.

Executed as of January 18, 2019.



Leonard Westlake

# Exclusion Report - E911

| State | County          | Technology    | Phase | Compliant | P1 Complete | P2 Complete   | PSAP Name                                       | P1 Sites | P2 Sites | Total Sites | Notes   |
|-------|-----------------|---------------|-------|-----------|-------------|---------------|---|----------|----------|-------------|---------|
| AZ    | Coconino        | CDMA_UMTS     | 2     | NO        | 2/3/09      | 7/15/09 CDMA  | Page Police Dept                                | 0        | 9        | 9           |         |
| AZ    | Coconino        | UMTS          | 2     | NO        |             |               | Kane County Sheriff Office Dispatch             | 0        | 1        | 1           |         |
| AZ    | Maricopa        | CDMA_GSM_UMTS | 2     | NO        | 8/6/10      | 8/6/2010 CDMA | Maricopa County Sheriff Office                  | 0        | 7        | 7           |         |
| AZ    | Maricopa        | CDMA_GSM_UMTS | 2     | NO        | 8/6/10      | 8/6/2010 CDMA | Wickenburg Police Department                    | 0        | 3        | 3           |         |
| AZ    | Pima            | CDMA_GSM_UMTS | 2     | NO        | 7/28/10     | 6/17/10 CDMA  | Pima County Sheriff - Ajo                       | 0        | 13       | 13          |         |
| AZ    | Pima            | CDMA_GSM_UMTS | 2     | NO        | 7/28/10     | 6/17/10 CDMA  | Pima County Sheriff - Tucson                    | 0        | 7        | 7           | Exclude |
| AZ    | Yavapai         | CDMA_GSM_UMTS | 2     | NO        | 2/8/10      | 2/10/10       | Yavapai County Sheriff Office                   | 0        | 4        | 4           |         |
| CA    | Inyo            | CDMA_GSM_UMTS | 2     | NO        | 1/27/11     | 1/27/11       | Inyo County Sheriff                             | 0        | 1        | 1           |         |
| CA    | Inyo            | CDMA_GSM_UMTS | 2     | NO        |             |               | California Highway Patrol-Bishop Communications | 0        | 1        | 1           |         |
| CO    | Alamosa         | CDMA          | 2     | NO        |             | 9/7/18        | Colorado State Patrol-Alamosa                   | 0        | 1        | 1           |         |
| CO    | Archuleta       | CDMA_GSM_UMTS | 2     | NO        |             |               | Archuleta County Combined Dispatch              | 0        | 3        | 3           |         |
| CO    | Chaffee         | CDMA_GSM      | 2     | NO        | 7/13/10     | 7/13/10 CDMA  | Chaffee County Sheriff                          | 0        | 2        | 2           |         |
| CO    | Delta           | CDMA          | 2     | NO        |             |               | Delta County Sheriff Office                     | 0        | 3        | 3           |         |
| CO    | Dolores         | CDMA_GSM_UMTS | 2     | NO        |             |               | Cortez Police Department                        | 0        | 3        | 3           |         |
| CO    | Elbert          | CDMA_GSM_UMTS | 2     | NO        |             |               | Douglas Regional 911 Dispatch                   | 0        | 5        | 5           |         |
| CO    | Garfield        | CDMA_GSM_UMTS | 2     | NO        |             |               | Garfield County Emergency Communications        | 0        | 3        | 3           |         |
| CO    | Gunnison        | CDMA_GSM_UMTS | 2     | NO        | 7/14/10     | 7/14/10       | Gunnison County Communications                  | 0        | 7        | 7           | Exclude |
| CO    | Hinsdale        | CDMA_GSM_UMTS | 2     | NO        |             |               | Gunnison County Communications                  | 0        | 2        | 2           | Exclude |
| CO    | Lake            | CDMA_GSM      | 2     | NO        | 7/15/10     | 7/15/10       | Lake County Sheriff                             | 0        | 1        | 1           |         |
| CO    | LaPlata         | CDMA          | 2     | NO        | 6/2/08      | 11/3/09       | Durango-La Plata Emergency Communications       | 0        | 2        | 2           |         |
| CO    | Las Animas      | CDMA          | 2     | NO        |             |               | Trinidad Police Department                      | 0        | 2        | 2           |         |
| CO    | Mineral         | CDMA_GSM_UMTS | 2     | NO        |             |               | Colorado State Patrol-Alamosa                   | 0        | 3        | 3           |         |
| CO    | Montezuma       | CDMA_GSM_UMTS | 2     | NO        | 1/22/09     | 11/3/08       | Cortez Police Department                        | 0        | 4        | 4           |         |
| CO    | Montrose        | CDMA_GSM_UMTS | 2     | NO        | 9/22/09     | 9/22/09       | Montrose County Sheriff Office                  | 0        | 3        | 3           | Exclude |
| CO    | Ouray           | CDMA_UMTS     | 2     | NO        |             |               | Montrose County Sheriff Office                  | 0        | 4        | 4           | Exclude |
| CO    | Park            | CDMA_GSM_UMTS | 2     | NO        | 10/7/08     | 6/30/05       | Park County Communications Center               | 0        | 15       | 15          |         |
| CO    | Prowers         | CDMA_UMTS     | 2     | NO        | 10/7/08     | 6/30/05       | Prowers County Communications                   | 0        | 1        | 1           |         |
| CO    | Pueblo          | CDMA_GSM      | 2     | NO        |             |               | Pueblo County Sheriff Office                    | 0        | 3        | 3           |         |
| CO    | Rio Blanco      | CDMA_GSM_UMTS | 2     | NO        | 9/24/09     | N/A           | Rio Blanco County Sheriffs Office               | 0        | 5        | 5           |         |
| CO    | Rio Grande      | CDMA          | 2     | NO        |             |               | Colorado State Patrol-Alamosa                   | 0        | 1        | 1           |         |
| CO    | San Miguel      | CDMA_GSM_UMTS | 2     | NO        |             |               | Western Colorado Regional Dispatch              | 0        | 2        | 2           |         |
| CO    | San Miguel      | CDMA_GSM      | 2     | NO        |             |               | San Miguel County Sheriff Office                | 0        | 1        | 1           |         |
| CO    | Teller          | CDMA_UMTS     | 2     | NO        |             |               | Teller County Sheriff                           | 0        | 1        | 1           |         |
| MT    | Sanders         | CDMA_GSM_UMTS | 2     | NO        |             |               | Sanders County 911                              | 0        | 1        | 1           |         |
| MT    | Madison         | CDMA_UMTS     | 2     | NO        |             | 2/23/16       | Madison County Sheriff Office                   | 0        | 1        | 1           |         |
| MT    | Meagher         | CDMA          | 2     | NO        |             | 10/22/14      | Meagher County Sheriff Office                   | 0        | 1        | 1           |         |
| ND    | Ward            | CDMA          | 2     | NO        | 4/5/11      |               | Minot City-Ward County Central Dispatch         | 0        | 1        | 1           |         |
| NM    | Catron          | CDMA_GSM      | 2     | NO        | 10/30/09    | 10/30/09      | Catron County Sheriff                           | 0        | 3        | 3           |         |
| NM    | Colfax          | CDMA_GSM_UMTS | 2     | NO        | 9/25/09     | 9/25/09       | Raton Police Department                         | 0        | 8        | 8           | Exclude |
| NM    | Grant           | GSM           | 2     | NO        | 6/2/09      |               | Grant County Regional Dispatch                  | 0        | 2        | 2           |         |
| NM    | Hidalgo         | GSM_UMTS      | 2     | NO        | 9/24/09     |               | Hidalgo County Sheriff                          | 0        | 1        | 1           |         |
| NM    | Lincoln         | CDMA_UMTS     | 2     | NO        |             |               | Ruidoso Police Department                       | 0        | 1        | 1           |         |
| NM    | Los Alamos      | CDMA_UMTS     | 2     | NO        | 4/25/08     | 6/25/09       | Los Alamos County Police Dept                   | 0        | 4        | 4           |         |
| NM    | Mora            | CDMA_GSM_UMTS | 2     | NO        | 12/14/10    | 6/9/11        | Dept of Public Safety Dist 2-Las Vegas          | 0        | 12       | 12          | Exclude |
| NM    | Otero           | CDMA_UMTS     | 2     | NO        |             |               | Otero County Sheriff                            | 0        | 5        | 5           |         |
| NM    | Otero           | CDMA_UMTS     | 2     | NO        |             |               | Lincoln County Sheriff Department               | 0        | 1        | 1           |         |
| NM    | Rio Arriba      | CDMA_GSM_UMTS | 2     | NO        | 11/18/08    | 10/28/09      | Espanola-Rio Arriba 911                         | 0        | 16       | 16          |         |
| NM    | Rio Arriba      | CDMA_UMTS     | 2     | NO        |             |               | San Juan County Communications                  | 0        | 1        | 1           |         |
| NM    | San Juan        | CDMA_GSM_UMTS | 2     | NO        | 4/25/08     | 9/25/09       | San Juan County Communications                  | 0        | 10       | 10          |         |
| NM    | Sandoval        | CDMA_GSM_UMTS | 2     | NO        | 11/12/08    | 10/29/09      | Sandoval County Communications                  | 0        | 9        | 9           | Exclude |
| NM    | Santa Fe        | CDMA_UMTS     | 2     | NO        | 10/20/08    | 10/9/09       | Santa Fe Emergency Communications               | 0        | 3        | 3           | Exclude |
| NM    | Taos-Coflax     | CDMA_GSM_UMTS | 2     | NO        | 1/20/09     | 10/15/09      | Taos Central Communications                     | 0        | 5        | 5           |         |
| NM    | Taos- Red River | CDMA_GSM      | 2     | NO        | 10/16/09    | 10/16/09      | Taos Central Communications/RED RIVER MARSHALL  | 0        | 23       | 23          |         |
| NV    | Churchill       | CDMA_GSM_UMTS | 2     | NO        | 6/15/09     | 9/22/09       | Churchill County Sheriff                        | 0        | 14       | 14          |         |
| NV    | Esmeralda       | CDMA_GSM_UMTS | 2     | NO        | 2/3/11      | 2/3/11        | Nye County Sheriff-Tonopah                      | 0        | 4        | 4           |         |
| NV    | Esmeralda       | CDMA_GSM_UMTS | 2     | NO        |             |               | Nye County Sheriff-Beatty                       | 0        | 1        | 1           |         |
| NV    | Esmeralda       | CDMA_GSM_UMTS | 2     | NO        |             |               | Nye County Sheriff-Pahrump                      | 0        | 1        | 1           |         |
| NV    | Humboldt        | CDMA_GSM_UMTS | 2     | NO        |             |               | Humboldt County Sheriff                         | 0        | 16       | 16          |         |
| NV    | Lander          | CDMA_GSM_UMTS | 2     | NO        |             |               | Nye County Sheriff-Tonopah                      | 0        | 1        | 1           |         |
| NV    | Lyon            | CDMA          | 2     | NO        | N/A         | N/A           | Lyon County Sheriff                             | 0        | 1        | 1           |         |
| NV    | Mineral         | CDMA_GSM_UMTS | 2     | NO        |             |               | Nye County Sheriff-Tonopah                      | 0        | 1        | 1           |         |
| NV    | Nye             | CDMA_GSM_UMTS | 2     | NO        | 2/3/11      | 2/3/11        | Nye County Sheriff-Beatty                       | 0        | 3        | 3           |         |
| NV    | Nye             | CDMA_GSM_UMTS | 2     | NO        |             |               | Nye County Sheriff-Tonopah                      | 0        | 4        | 4           |         |
| NV    | Nye             | CDMA_GSM_UMTS | 2     | NO        |             |               | Nye County Sheriff-Pahrump                      | 0        | 5        | 5           |         |
| NV    | Pershing        | CDMA_GSM_UMTS | 2     | NO        |             |               | Pershing County Sheriff                         | 0        | 7        | 7           |         |
| NV    | Washoe          | CDMA_GSM_UMTS | 2     | NO        | 2/17/11     | 2/17/11       | Reno Public Safety Dispatch                     | 0        | 4        | 4           |         |
| OR    | Malheur         | CDMA          | 2     | NO        | 7/12/10     | 7/12/10       | Malheur County Sheriff                          | 0        | 1        | 1           |         |
| TX    | Brewster        | CDMA_UMTS     | 2     | NO        |             | 8/10/11       | Brewster County Sheriff                         | 0        | 5        | 5           |         |
| UT    | Beaver          | CDMA_GSM      | 2     | NO        | 6/28/11     |               | Beaver County Sheriffs Office Dispatch          | 0        | 1        | 1           |         |
| UT    | Box Elder       | CDMA_UMTS     | 2     | NO        |             |               | Box Elder Communications                        | 0        | 1        | 1           |         |
| UT    | Garfield        | CDMA_GSM_UMTS | 2     | NO        | 6/29/11     |               | Garfield County Sheriffs Office Dispatch        | 0        | 3        | 3           |         |
| UT    | Kane            | CDMA_GSM_UMTS | 2     | NO        |             |               | Kane County Sheriff                             | 0        | 3        | 3           |         |
| UT    | Kane            | CDMA_UMTS     | 2     | NO        |             |               | Page Police Dept                                | 0        | 1        | 1           |         |
| UT    | San Juan        | CDMA_GSM_UMTS | 2     | NO        |             |               | San Juan County Sheriff                         | 0        | 9        | 9           |         |
| UT    | Wayne           | CDMA_GSM_UMTS | 2     | NO        | 6/21/11     |               | Richfield Communications Center                 | 0        | 3        | 3           |         |
| WY    | Fremont         | CDMA_GSM_UMTS | 2     | NO        | 8/1/13      |               | Fremont County Sheriff Office                   | 0        | 2        | 2           |         |
| WY    | Goshen          | CDMA_GSM_UMTS | 2     | NO        | 4/7/12      |               | Torrington Police Department                    | 0        | 2        | 2           |         |